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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of

HAWAIIAN ELECTRIC COMPANY, INC.

For Approval of Rate Increases and Revised Rate
Schedules and Rules

DOCKET NO. 2006-0386

MOTION TO INTERVENE AND
BECOME A PARTY
AND
CERTIFICATE OF SERVICE

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COMMISSION

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ATTORNEY FOR
DEPARTMENT OF DEFENSE

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)	
HAWAIIAN ELECTRIC COMPANY, INC.)	
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DOCKET NO. 2006-0386

MOTION TO INTERVENE AND
BECOME A PARTY

Pursuant to Hawaii Administrative Rules ("HAR") sec. 6-61-55, this "Motion to Intervene and Become a Party" before the Public Utilities Commission of the State of Hawaii (Docket No. 2006-0386) is respectfully submitted by the Department of the Navy on behalf of the Department of Defense (collectively referred to herein as DoD), by and through its attorney.

As grounds for said intervention, Movant avers as follows:

1. Movant maintains numerous military installations within the State of Hawaii which activities obtain and use electric services from applicant companies Hawaiian Electric Company, Inc. (HECO or the Company), a public utility subject to this Commission's jurisdiction. The nature and extent of DoD's property, financial and other interests are substantial. The fact is that the DoD is one of the largest purchasers of electric services in the State of Hawaii. The DoD has been a party in other dockets related to Rate Increases and Rate Design, Integrated Resource Planning, and Demand Side

Management. The DoD has a crucial and strategic interest in securing electricity at the lowest but fair cost.

2. The nature of the matters which are the subject of this docket could have a substantial impact on the Movant.
3. It is not unlikely that the Movant's positions may be different from those advocated by HECO, the Consumer Advocate, or any other party to the proceeding.
4. Movant's participation can assist in producing complete and accurate discovery and developing a sound record. The DoD believes its participation will enable the Commission to view and consider all the pertinent available information.
5. Movant's intervention would serve the public interest in that this Movant expends funds on behalf of the taxpayers of the United States in the furtherance of the goals and objectives of the Government. It is in the taxpayers' interest to ensure that their tax dollars are (1) being spent to buy necessary goods and services that are reasonable in price, and (2) to ensure that the expertise available to their government is utilized to its maximum extent in ensuring the reasonableness and continued availability of the utility services to the Government and the general public at the least cost. Movant's intervention would not unreasonably broaden the issues or delay the proceedings in this docket.
6. Communications in regard to this petition are to be addressed to:

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WHEREFORE, Movant requests an order granting Movant's Motion to Intervene and Become a Party hereto with the right to have notice of, and appear at the taking of testimony, produce and cross examine witnesses, and be heard in person or by counsel, upon brief and at oral argument, if oral argument is granted, and to otherwise be granted full party status herein.

Dated this 20th day of February 2007.

Respectfully submitted,



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ATTORNEY FOR THE
DEPARTMENT OF DEFENSE

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing MOTION TO INTERVENE AND BECOME A PARTY was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

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2 Copies

DATED: Honolulu, Hawaii, February 20, 2007


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